WESTON • SPER
Suite 1501, Northbrook Office Court
666 West Dundee Road, Northbrook, IL 60062 • (312) 498-9091

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6069

Mr. Robert Bowden, Chief
Waste Management Division
Emergency Response Section
U.S. Environmental Protection Agency
11th Floor
230 South Dearborn Street
Chicago, Illinois 60604

March 3, 1986

TAT-05-F-00809

Re: I.J. Recycling, Ft. Wayne, Indiana
TDD# 5-8601-02

Dear Mr. Bowden:

On January 3, 1986, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to investigate an organic solvent spill at the I.Jones Recycling, Inc., facility in Ft. Wayne, Indiana. The investigation was to assess the need for a U.S. EPA Emergency Removal Action. On January 3, 1986, TAT members Tom Gainer, David Pyles, and Paul Aronian arrived at the I.Jones Recycling facility, located at 3651 N. Clinton Street, Ft. Wayne, Indiana (Figures 1 and 2). The TAT met with representatives of I.Jones Recycling, Inc., Indiana State Board of Health (ISBH), Ft. Wayne/Allen County Health Department, and Pollution Control Systems, Inc. (PCS) (see Attachment A for attendance list). The recovery operations were in progress and the spilled material had been contained at the time of the arrival by the TAT.

The facility had been out of operation for two years prior to the spill. A site assessment had been conducted of the dormant facility in March 1985 by the TAT. At this time, Continental Waste Systems was the proprietor. On December 21, 1985, I.Jones Recycling started to heat Building B (Figure 2) in an attempt to make the facility operational. On December 24, 1985, a portion of the building's water-logged ceiling collapsed as a direct result of the thaw. The fallen debris sheared the bottom valve off a 10,000 gallon tank within the building. The tank contained approximately 9,400 gallons of ink solvents. Five thousand to 6,000 gallons of this

material were discharged onto the concrete floor before the valve was repaired. The spilled liquid flowed out through a door located on the south side of Building B onto a concrete pad. The material was initially contained by an existing six inch dike surrounding the pad. Additional sand was added to improve the dike's capacity and integrity; however, the capacity of the impoundment was soon exceeded and the spilled material discharged to the south and entered a storm sewer. I.Jones' employees and Dave Camperman (Ft. Wayne/Allen County Health Department) unsuccessfully attempted to seal off the sewer entrance to keep the spilled product from migrating off site. Approximately 1,500 gallons of spill material entered the storm sewer located near the entrance of the facility.

The storm sewer extends 0.5 miles below ground and discharges into an open-flow run-off channel (Figure 3). The channel is approximately 4 to 10 feet in width and 1.5 miles in length and flows through a residential area and city park prior to discharging into the St. Joseph River. The discharge point is located downstream of the Ft. Wayne drinking water intake. There are no known drinking water wells in the area.

I.Jones Recycling contracted PCS to perform containment and recovery operations on the spill material in the run-off channel on December 25, 1985. PCS arrived on December 26, 1985, and installed two underflow dams across the channel in Johnny Appleseed Park. The floating product was then collected from the surface with a vacuum truck. The contractor also placed absorbent pads, pillows, and booms (including a carbon boom) at various points along the channel. At the facility, spill material and associated contaminated water were pumped into on-site storage tanks (including the repaired tank that had been the source of the spill). A total of 16,000 gallons of spill material and associated water (approximately 5 to 10% product) was recovered. It was felt that the majority of the 1,500 gallons of spill material which entered the storm sewer system was recovered. State health officials had collected a sample of water from the creek prior to containment and analysis indicated moderate levels of assorted solvents: methyl ethyl ketone, benzene, toluene, xylene, and methyl isobutyl ketone (Attachment B).

Following the described actions performed by PCS on December 26, 1985, PCS refused to work until guaranteed funds were secured by I.Jones Recycling. The spill material remained impounded in the run-off channel for approximately one week. On January 2, 1986, heavy rains caused both dikes to breach,

thus irreversibly releasing the spill material. The product flowed down the run-off creek into the St. Joseph river where it flowed downstream under the frozen ice cap. Without knowledge of the secondary release, the ISBH submitted a Notice of Violation to I. Jones Recycling on January 3, 1986, requesting cleanup of the impounded spill material. I. Jones Recycling agreed to assume resonsibility and issued a retaining fee to PCS. On January 3, 1986, PCS mobilized again and reconstructed the containment dike and placed absorbent pads on the contained liquids (see photographs, Attachment C).

The TAT agreed that the response actions observed on January 3, 1986, were adequate; however, some of the response actions prior to that date could have been improved. Had the following items been addressed, the extent of contamination would have been greatly reduced:

- Better containment efforts at the facility during the release to prevent discharge into the sewer system; and,
- The impounded spill material should have been removed immediately instead of standing for a week.

The following future actions are recommended to alleviate the potential for additional releases from the facility and to provide for an adequate cleanup of the present spill:

- Areas of stained sediment and ice should be removed (scraped) from the run-off channel and stored/treated on an impervious diked pad at I.Jones Recycling;
- The extent of contamination should be determined in the run-off channel and any highly contaminated soils removed;
- Government agencies should require I.Jones Recycling to establish a contingency plan for emergency actions, including personnel training and standby containment/ cleanup materials;
- Construct a concrete curb with a gate around the sewer inlet point at the facility which could effectively seal off the sewer in the event of future releases and contain the release on site;

- Inspection of the building structure by the city engineer in light of the recent collapse of the ceiling;
- Increase tank farm containment capacity;
- Immediately process RCRA permits for I.Jones Recycling so that they may treat the cleanup material and the wastes which have been stored there for the past two years; and,
- No new waste should be accepted at I.Jones Recycling until there has been a 75% reduction of their present inventory.

The state and county health officials will continue to monitor the cleanup activities and process start-up at the facility.

If you should have any questions or comments or require additional information, please do not hesitate to call.

Very truly yours,

ROY F. WESTON, INC.

Tom Gainer
Environmental Engineer

Scott D. Springer
Technical Assistance Team
Leader, Region V

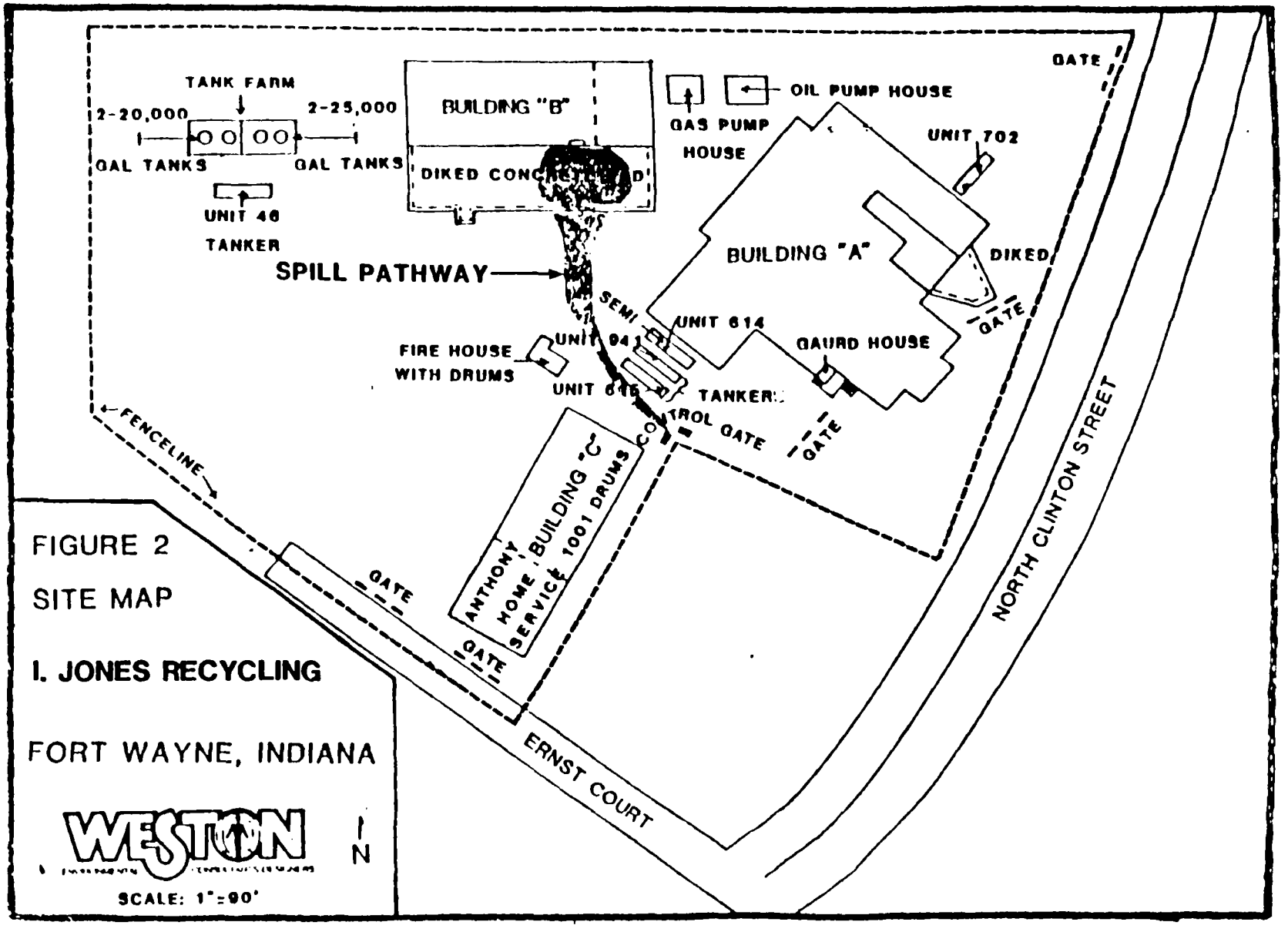
TG:ap

Enclosure

FIGURE 1
SITE LOCATION MAP
I. JONES RECYCLING
3651 N. CLINTON ST.
FORT WAYNE, INDIANA

WESTON

SOURCE: U.S.G.S. TOPOGRAPHIC MAP



SOURCE: LOUGHEED & ASSOCIATES, INC.

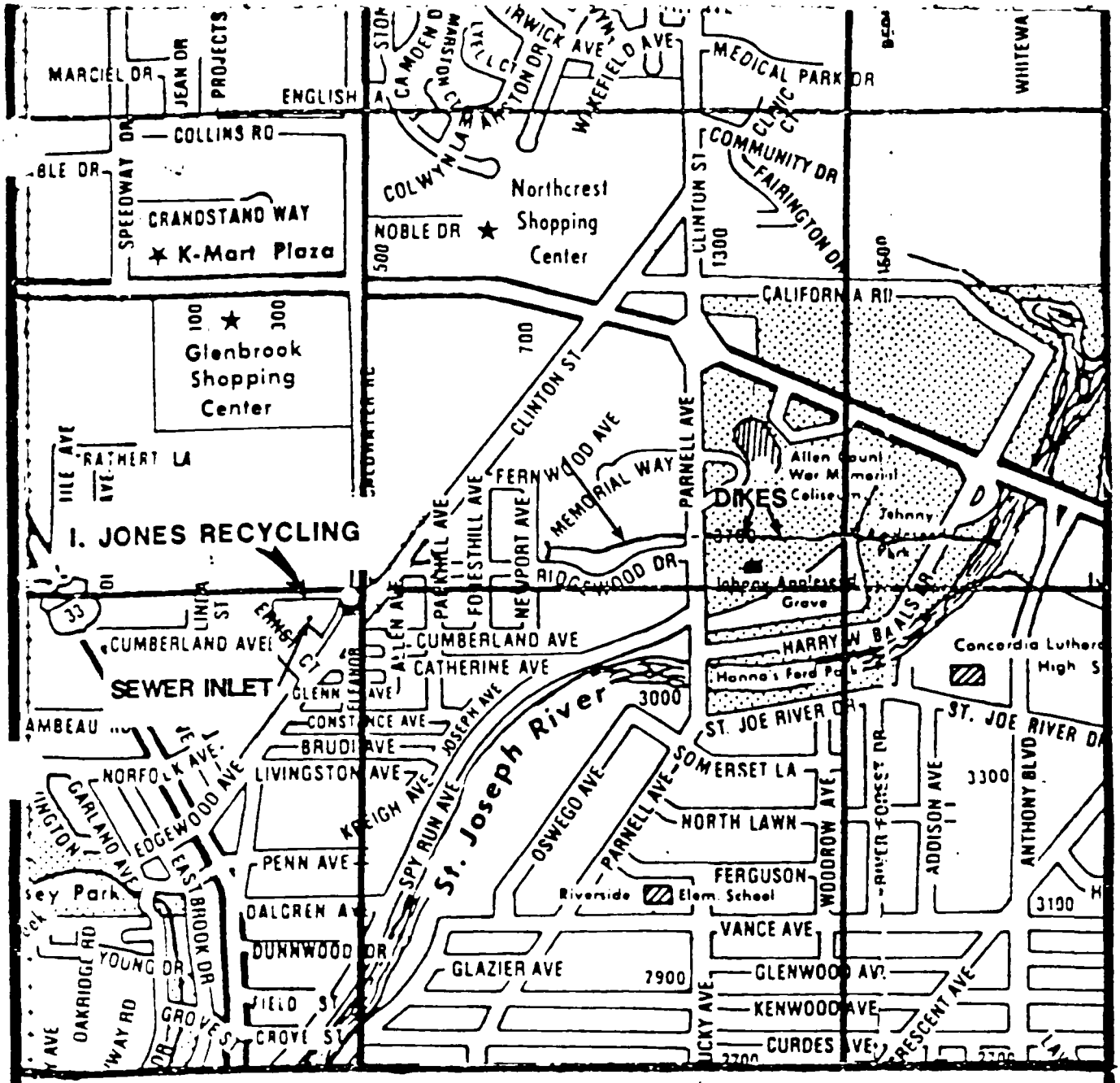


FIGURE 3

SPILL PATHWAY

I. JONES RECYCLING

FORT WAYNE, INDIANA

N

SCALE: 1"=1200'

ROY F. WESTON, INC.

WESTON

ENVIRONMENTAL CONSULTANTS

DRAWN	DATE	DES. ENG	DATE	WO NO.
CHECKED		APPROVED		

ATTACHMENT A

ATTENDANCE LIST FOR THE I.JONES
RECYCLING, INC. SPILL RESPONSE

ATTENDANCE LIST FOR THE I.JONES
RECYCLING, INC. SPILL RESPONSE
FT. WAYNE, INDIANA
JANUARY 3, 1986

Bob Moran
Indiana State Board of Health
(317) 633-0682

Dave Camperman
Ft. Wayne/Allen County Health Dept.
(219) 428-7108

Skip Vanderberg-Managing Spill Response
Randy Fetcher-Plant Engineer
I.Jones Recycling, Inc.
(219) 482-8422

Pollution Control Systems, Inc.-Cleanup Contractor
(219) 637-3137

Tom Gainer
Dave Pyles
Paul Aronian
Technical Assistance Team
(312) 498-9090

ATTACHMENT B

ANALYSES FROM RUN-OFF CREEK WATER
I.JONES RECYCLING

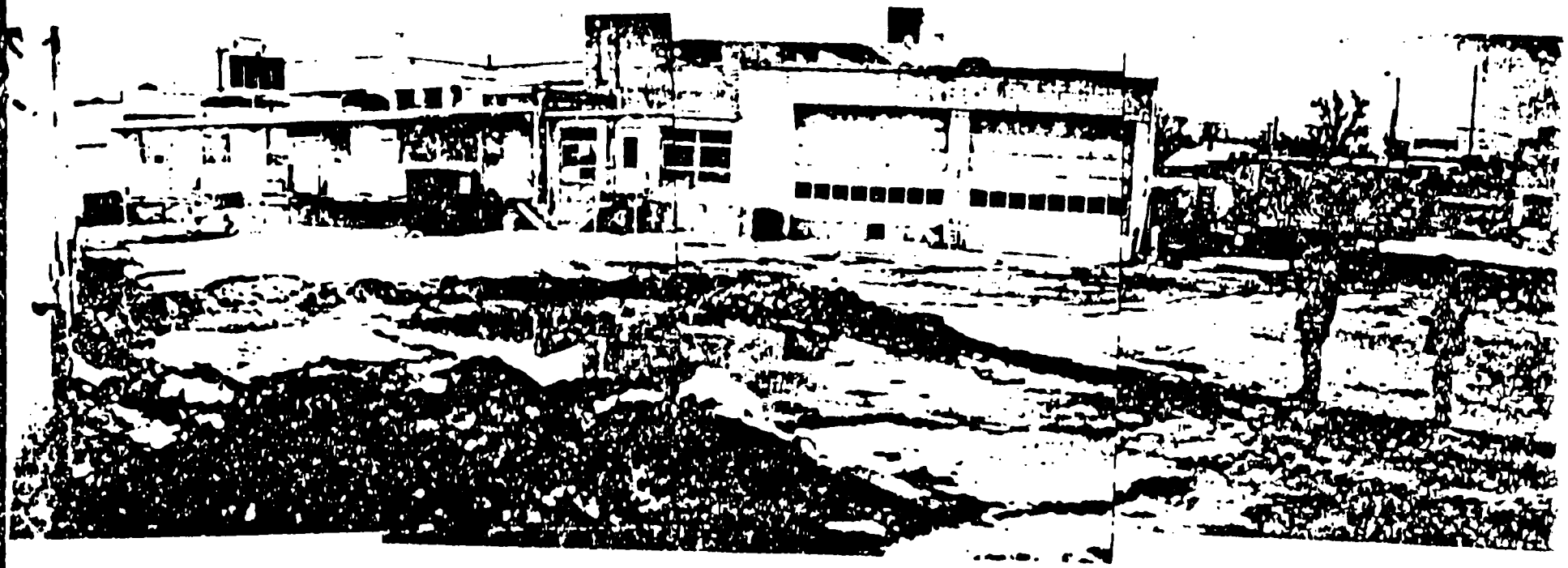
ANALYSES FROM RUN-OFF CREEK WATER
BY THE INDIANA STATE BOARD OF HEALTH
I.JONES RECYCLING, FT. WAYNE INDIANA
DECEMBER 26, 1985

Component	Concentration (ppb)
Benzene	40,000
Methyl Ethyl Ketone	10,000
Methyl Isobutyl Ketone	2,500
Toluene	1,000
Ethylbenzene	200
Methylene Chloride	40

Source: Telephoned results from personal communication ISBH on 1-3-86.

ATTACHMENT C

PHOTOGRAPHS FROM THE
I. JONES RECYCLING, INC., SPILL RESPONSE
FT. WAYNE, INDIANA, JANUARY 3, 1986



1,2,3. Remains of impounded spill material on concrete pad adjacent to Building B facing Building A (East-SE). Spill flowed over concrete dike (near people's feet) around the far corner of the parked trailers (right side) into sewer inlet. I. Jones Recycling, 1/31 86, 1710. Photographer: D. Pyles.

m storage inside
y B. I. Jones
ng, 1/3/86, 1700.
pher: D. Pyles.

rage inside
ith standing
aking roof.
cling, 1/3/
otographer:

tainment
with
product.
1/3/86,
r:

· point of dis-

8. Runoff channel with dark liquid immediately east of Parnell Ave. above first dike in Johnny Appleseed Park. I. Jones Recycling, 1 3/86, 1745. Photographer: D. Pyles.

9. Runoff channel facing east with first and second dikes(second dike under reconstruction with backhoe)in Johnny Appleseed Park. Product vacuum skimmer in front of first dike(not operating then). I. Jones Recycling, 1/3/86, 1745. Photogra[illegible]

COST CENTER:	ACKNOWLEDGEMENT OF COMPLETION FOR TDD TAT EMERGENCY RESPONSE, REMOVAL AND PREVENTION ROY F. WESTON, INC.	2. NO.: 5-8[illegible]1-62 ☒ COMPLETE ☐ INTERIM

RESPONSE: Submitted herewith is TAT's letter report concerning the organic solvents spill at I. [illegible] Ft. Wayne, Indiana

☐ FORMAL REPORT
☒ LETTER REPORT
☐ FORMAL BRIEFING
☐ OTHER (SPECIFY)

A. COST TO DATE: [illegible] DATE: 1/[illegible]

B. TOTAL COST TO CLOSURE: ______

3C. ACTUAL TOTAL HOURS: ______

DPO ACTION: ☐ ACCEPTED ☐ ACCEPTED WITH EXCEPTIONS ☐ REJECTED

COMMENTS: ______

I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.

______
(TATL SIGNATURE)

7. DATE: ______

I ACKNOWLEDGE THAT I HAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFIED IN THE SUBJECT TDD WITHIN ITS ORIGINAL OR REVISED TIME FRAMES.

______
(AUTHORIZING DPO SIGNATURE)

9. DATE: ______

White — TATL Copy
Green — DPO Copy (Signed by TATL, Replaces Original)
Canary — NPMO Copy
Pink — Project Officer Copy
Blue — Contracting Officer (Washington, D.C.)
White — DPO Original (Unsigned by TATL)
Goldenrod — DPO Interim Copy

RFW 381-6-84